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In re:

NIMESHKUM S. PATEL AND SHITAL M.
PATEL,

Debtors.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

CHAPTER 13

CASE NO. 24-11166 (RG)

Hearing Date and Time:
April 17, 2024 at 10 am

WOORI AMERICA BANK'S OBJECTION TO CONFIRMATION OF THE PLAN

Woori America Bank, through its undersigned counsel, Robert Yu, Esq. by way of objection to the Debtors' proposed plan respectfully objects as follows:

1. On April 1, 2024, Woori America Bank as secured creditor, filed its secured proof of claim in the amount of \$152,897.72 and specified pre-petition arrears in the amount of \$4,876.73 (filed as Claim 17).
2. While Debtors' Plan appears to state that Woori America Bank's secured claim is unaffected by the Plan, the Plan nonetheless fails to provide for payment of Woori America Bank's prepetition arrearages.
3. As such, undersigned counsel objects to the Debtors' Plan in its present form.

WHEREFORE, for the foregoing reasons, undersigned counsel on behalf of Woori America Bank respectfully request that this Court enter an order denying confirmation of the Debtor's Plan in its present form and for such other and further relief as is just and proper.

Dated: April 10, 2024

ROBERT YU LLC
ATTORNEYS AT LAW
Attorneys for Woori America Bank

By: /s/ Robert Yu
Robert Yu, Esq.